

EXHIBIT 30

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF COLORED PEOPLE,
Spring Valley Branch; JULIO CLERVEAUX;
CHEVON DOS REIS; ERIC GOODWIN; JOSE
VITELIO GREGORIO; DOROTHY MILLER;
HILLARY MOREAU; and WASHINGTON
SANCHEZ,

Plaintiffs,

vs.

EAST RAMAPO CENTRAL SCHOOL DISTRICT
and MARYELLEN ELIA, in her Capacity
As the Commissioner of Education
of the State of New York,
Defendants.

17 Civ. 8943

VIDEOTAPED DEPOSITION OF YONAH ROTHMAN
Wednesday, November 14, 2018
New York, New York

REPORTED BY:
Christina Diaz, CRC, CRR, RMR, CSR, CLR
Job Number: 150986

1 Y. Rothman

2 plaintiffs.

3 MS. PARVIS: Elizabeth Parvis for

4 plaintiffs.

5 MR. CRAVENS: Will Cravens from

6 Morgan Lewis & Bockius for the defendant.

7 MR. BUTLER: David Butler for the

8 defendant.

9 THE VIDEOGRAPHER: Will the court

10 reporter please affirm the witness.

11 Y O N A H R O T H M A N ,

12 having been duly affirmed by a

13 Notary Public, was examined and testified

14 as follows:

15 EXAMINATION

16 BY MR. JASON:

17 Q. Good morning, Mr. Rothman. I am

18 Kevin Jason. I work for the New York Civil

19 Liberties Union and I represent the plaintiffs

20 in this case.

21 Could you state your name for the

22 record.

23 A. Yonah Rothman.

24 Q. Okay. And you were just sworn in by

25 the court reporter. Do you understand that

1 Y. Rothman

2 Q. Fair. In the 2012 school board
3 elections, you ran on slate with Mr. Solomon
4 and Mr. Lefkowitz, correct?

5 MR. CRAVENS: Objection to form.

6 A. I am not sure, again, what slate
7 means, but I didn't know I was running with
8 them until I actually saw a sign on somebody's
9 lawn, so if that's slate, then, yes.

10 Q. So you saw a sign with your name
11 alongside Mr. Lefkowitz' name and
12 Mr. Solomon's name?

13 A. Right.

14 Q. And this was a sign encouraging
15 people to vote for the three of you?

16 A. Yes. I was only approached only
17 about my seat. It's funny. I should have
18 asked that question, but I never did. Maybe
19 it was silly of me, but I was just only really
20 concerned about my running for myself. So
21 when I saw the sign, I was like, oh, I should
22 have asked who else is running with me but...

23 Q. Do you know who made the decision to
24 create a sign for the three of you?

25 A. No.

1 Y. Rothman

2 for. No one -- I never went to a meeting who
3 to vote for. I relied on reading the
4 newspaper the week before. I was really -- I
5 am a big proponent of going out to vote. I
6 just always have been. So I make my wife
7 vote. I go out and my children, when they
8 turn 18, they go out and vote. And I believe
9 in the democratic process. I think that's how
10 you make change.

11 But there is no official group.
12 This WhatsApp group is probably as big as
13 anything that -- big that any kind of thing
14 that's set up out there. There is no like
15 mass e-mail, mail. You get some things in the
16 mail like from both sides, why they -- people
17 represent. You get that political mail like
18 you would get under any election, government,
19 senate, mayor election. And I think that can
20 be convincing. It's that people put a message
21 out. The other school wants to take away your
22 bussing. If the private school parent knows
23 all they get is bussing, and they are going to
24 take that away, and they are paying a lot in
25 taxes, they feel like, "I better vote for this

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2 I N D E X
3

4 WITNESS
5 Yonah Rothman
6 EXAMINATION BY
7 Mr. Jason

PAGE
6

10 E X H I B I T S
11 (Exhibits attached to transcript)

12 ROTHMAN	13 DESCRIPTION	14 PAGE
15 Exhibit 1	16 Notice of Non-Party 17 Subpoena Duces Tecum, 18 two pages, with 19 attachments	20 32
21 Exhibit 2	22 Annual Budget & Trustee 23 Vote, Tuesday, May 15, 24 2012, Official Results, 25 one page	26 77
27 Exhibit 3	28 Expenditure and 29 Contribution Statement 30 for Candidates for 31 Member of the Board of 32 Education bearing 33 Production No. ERCSD 34 17737	35 92
36 Exhibit 4	37 Expenditure and 38 Contribution Statement 39 for Candidates for 40 Member of the Board 41 of Education bearing 42 Production No. ERCSD 43 17768	44 93

	E X H I B I T S (Continued)	
	DESCRIPTION	PAGE
3	ROTHMAN	
4	Exhibit 5	e-mail string beginning with e-mail dated 6/3/15 bearing Production No. ERSCD_ROTHMAN 307 through 308
7	Exhibit 6	Meeting Minutes dated July 2, 2013, pages 7295 through 7322
9	Exhibit 7	Article dated July 4, 2013, two pages
10	Exhibit 8	Letter dated July 7, 2013 bearing Production No. ERSCD_ROTHMAN 184
13	Exhibit 9	Meeting Minutes dated October 7, 2015, pages 7725 through 7727
15	Exhibit 10	e-mail string beginning with e-mail dated 3/7/2013 bearing Production Nos. ERSCD_ROTHMAN 406 through 407
18	Exhibit 11	Letter dated March 7, 2013, two pages
19	Exhibit 12	e-mail string beginning with e-mail dated 12/12/12 bearing Production No. ERSCD_ROTHMAN 389
22	Exhibit 13	e-mail dated 5/20/13 bearing Production No. ERSCD_ROTHMAN 238
24	Exhibit 14	e-mail string beginning with e-mail dated 5/20/13 bearing Production No. ERSCD_ROTHMAN 239

	E X H I B I T S (Continued)	
	DESCRIPTION	PAGE
1		
2	ROTHMAN	
3	Exhibit 15	e-mail string beginning with e-mail dated 5/20/13 bearing Production Nos. ERSCD_ROTHMAN 245 through 246
4		210
5		
6	Exhibit 16	e-mail string beginning with e-mail dated 5/20/13 bearing Production Nos. ERSCD_ROTHMAN 247 through 248
7		212
8		
9	Exhibit 17	Letter dated December 17, 2015 bearing Production Nos. ERCSD_GROSSMAN 583 through 584
10		215
11		
12	Exhibit 18	Article dated December 17, 2015, four pages
13		216
14		
15	Exhibit 19	e-mail string beginning with e-mail dated 10/15/15 bearing Production Nos. ERCSD_GROSSMAN 838 through 840
16		227
17		
18	Exhibit 20	e-mail dated 10/13/15 bearing Production No. ERCSD_GROSSMAN 841
19		229
20	Exhibit 21	WhatsApp Chat Transcript bearing Production No. ERCSD_BoA 75 through 76
21		244
22	Exhibit 22	ERCSA_BOE 75 Binders 1 and 2
23		244
24	Exhibit 23	WhatsApp Chat Transcript bearing Production Nos. ERCSD_BoA 500 through 502
25		248

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2 INFORMATION REQUESTS

3 INSERTED INFORMATION - NONE -

4 REQUESTS FOR PRODUCTION - NONE -

5 RULING - NONE -

6 DIRECTIONS NOT TO ANSWER - NONE -

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